

REMARKS

Claims 1-5, 8, 10-16 and 19-28 are pending in the application and stand rejected.

Applicants respectfully traverse the rejections, and request reconsideration based on the following remarks.

Claim Rejections- 35 U.S.C. § 102

Claims 1, 2, 15, 16, 22 and 24 stand rejected as being anticipated by U.S. Patent No. 6,374,210 to Chu. Applicants maintain that Chu is legally deficient to establish a prima facie case of anticipation against claims 1, 15 and 16, for at least those reasons explained in Applicants' previous Response filed on October 14, 2005. Rather than reiterate those arguments, Applicants will address the points raised in the Examiner's Response to Arguments as set forth on pages 2-4 of the Final Office Action.

Applicants previously noted that on a fundamental level, there are distinctions between Chu and the claimed invention regarding function and purpose in that Chu does not disclose methods and systems for *managing textual archives using semantic units of words*, for example. The Examiner's Response to Arguments generally refutes this point by according no patentable weight to the claim preambles and further noting that Chu discloses generating an index (Col. 5, lines 38-42).

It is to be noted, however, that Applicants' previous argument did not rely on the claim preambles to distinguish Chu. Rather, as previously noted by Applicants, Chu is clearly distinguishable in that Chu does not disclose a system or method in which *textual data is transcribed into corresponding semantic units of words, and then stored in a textual database, and where an index is then generated based on semantic units of words to index the stored textual data with the corresponding semantic units*. These points of contention were not specifically addressed by the Examiner's Response to Arguments.

For instance, the Examiner cites col. 5, lines 38-42 of Chu as disclosing “creating an index”. However, this section of Chu merely discloses a general idea of creating an index of word candidates. Moreover, Chu discloses that an input string is segmented into one or more word sequences using a lexicon and language model based on isolated words (Col. 5, lines 24-33). The Examiner has not explained how this discloses or suggests transcribing textual data into corresponding semantic units of words and storing the textual data in a textual database, much less generating an index based on semantic units of words to index the stored textual data with the corresponding semantic units.

Indeed, Chu discloses nothing more than transcribing textual data into whole words or sequences of whole words, but does not disclose or suggest transcribing textual data into semantic units of words. Although Chu generally discloses (in Col. 6, lines 5-45) a recognition method in which sub-word models are used to recognize whole words, Chu only discloses transcribing text string into whole words or word sequences and not semantic units of words. The Examiner’s interpretation of the “index of word candidates” as being the same as an “index of semantic units of words” is simply erroneous.

Moreover, Applicants maintain that Chu does not teach or suggest a process of *identifying a data type of the textual data and then transcribing the textual data into corresponding semantic units of words using a recognition system for the identified data type*, as essentially claimed in claims 1, 15 and 16. In refuting this point, the Examiner’s Response to Arguments essentially states that Chu meets the requirements of the broadly claimed “identifying the data type of the textual data” step because the Chu system provides support for several languages, and that the claims do not require that the data type be a type of textual style or font. The Applicants respectfully disagree.

Even assuming, *arguendo*, that the claimed “identifying the data type of the textual data” is broadly interpreted to include “identifying the language of the textual data” as asserted by the Examiner, the Examiner has failed to show that Chu even discloses a step of “identifying the language of an input text string.” Indeed, Chu’s generally statement that the “system may support different vocabularies for different languages” does not support the Examiner’s strained interpretation of Chu as disclosing a step of identifying the language of an input text string. In this regard, there is no teaching as to how the system chooses or switches between different vocabularies for different language strings.

Moreover, it is respectfully submitted that the Examiner’s reliance on Chu’s identification means (120) as teaching “identifying a data type of the textual data” is misplaced. Chu teaches that the identification means (120) performs a process of segmenting an input string into one or more word sequences using a word lexicon and language model for a specific language (see, Col. 5, lines 23-33). In other words, this process is performed for input string having a known language, and there is simply nothing in Chu that remotely suggests that the identification means (120) performs a process of first identifying the language of the input string and then selecting a proper recognition model prior to, and to perform, the segmentation process.

Accordingly, for at least the above reasons, claims 1, 15 and 16 are patentable distinct and patentable over Chu. Moreover, claims 2, 22 and 24 are patentably distinct and patentable over Chu at least by virtue of their dependence from respective base claim 1.

Claim Rejections- 35 U.S.C. § 103

The remaining dependent claims are rejected as being obvious in view of Chu in

combination with one or more of a myriad of other cited references, as set forth on pages 5-11 of the Office Action. In particular, each of the cited obviousness rejections are premised, in part, on Chu's purported teachings as applied to base claims 1, 15 and 16. However, without further elaboration required, each of the obviousness rejections are legally deficient on their face for at least the same reasons given above for claims 1, 15 and 16 in that Chu fails to disclose or suggest the claimed features of claims 1, 15 and 16. Accordingly, no *prima facie* case of obviousness has been established based on Examiner's reliance of Chu. Therefore, withdrawal of the above obviousness rejections is requested.

Respectfully submitted,



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